

HERTFORDSHIRE LOCAL ENTERPRISE PARTNERSHIP

GIFTS, ENTERTAINMENT AND HOSPITALITY POLICY

1. This Policy applies to all LEP Board, sub-group Members and staff. All employees of the LEP are employed on Hertfordshire County Councils ("HCC") terms and conditions of employment and therefore bound by the Officer Code of Conduct under HCC's Constitution.
2. As a general rule, no gift, entertainment or offer of hospitality should be accepted without first seeking and obtaining permission from the LEP Chief Executive.¹ The LEP Chief Executive reserves the right to escalate any concerns with the LEP Board, to his own discretion, as and when it is deemed appropriate. The LEP Board will review the matter before making a decision on how to proceed. The following notes represent guidance on what constitutes gift, entertainment or hospitality and is applicable for both members of Herts LEP Board/sub-boards (and their spouses, partners or relations) and to Herts LEP Executive Team (and their spouses, partners or relations).
3. Gifts, entertainment and hospitality is identified by the receipt or offer of gifts, meals, invitations to functions and events in relation to membership of the Herts LEP board/sub-boards or as a member of staff. There may be instances where LEP Board Members or Executive Team members receive invitations to events offered as part of normal working life – for example, opening celebrations, receptions, luncheons, annual conferences and dinners. If attendance at such events is considered important in building and maintaining relationships with these sectors and the hospitality received is likely to be reasonable, then these may be acceptable subject to the Executive Director's or LEP Board approval. In these instances, the relevant section on the 'Registration of Interests' form must be completed. However, if the gift, entertainment or hospitality is more frequent and at a higher value than the accepted threshold of £25 for employees or £50 for others on the LEP Board or sub-group Members that are not employees, then it is advisable to decline.
4. This is to ensure that the perception given of this gift, entertainment or hospitality is not one of appearing to influence or show bias for or against a person or organisation whilst on the Herts LEP Board/sub-boards or as an employee.
5. This guidance should also be seen to apply to spouses, partners, and relations, if the gift, hospitality or entertainment can be perceived or argued to benefit the board member in question.

Acceptance of Gifts

6. The basis is that all gifts should be declined, unless the gift is of a promotional, seasonal or trivial nature such as diaries, calendars, chocolates, pens and so on, if they bear company names and logos from which they are provided. These gifts should not exceed a value of £10. If a token gift is presented by an organisation it may be accepted if it has been authorised by the relevant member of staff.
7. Items of greater value than £10, or of lottery tickets, cash, gift vouchers or gift cheques cannot be accepted. This includes loyalty or discount cards that can be viewed as benefiting the individual.

¹ The LEP Chief Executive will seek permission from the LEP Chair before accepting any gift, entertainment or offer of hospitality.

8. All gifts must be reported and recorded accurately with the relevant information, in the Register of Interests held by Herts LEP Executive Team.

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